

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
UNITED STATES OF AMERICA :  
- v. - : **PROTECTIVE ORDER**  
ALEXEI SAAB, :  
Defendant. :  
: X

Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Samuel Adelsberg and Jason A. Richman, for a protective order relating to material produced pursuant to 18 U.S.C. § 3500 and *Giglio v. United States*, 405 U.S. 150 (1972) (collectively, the "3500 material"), and with the consent of defendant Alexei Saab, by and through his attorneys, Marlon Kirton, Esq., Esere J. Onaodowan, Esq., and Alexandra Tseitlin, Esq., it is hereby ORDERED that:

1. Defense counsel must destroy or return to the Government all 3500 material and any witness list, at the conclusion of the trial of this matter or when any appeal (including post-conviction relief under 28 U.S.C. § 2255) has become final; and
2. The defense is precluded from disseminating or disclosing any 3500 material and any witness list to anyone other

than the defendant, the defendant's counsel, any paralegal or staff employed by the defense for the purpose of representing the defendant, and any expert witness the defense has retained or consulted with in connection with this case; and

3. In light of the COVID-19 pandemic and the defendant's quarantine at the Metropolitan Detention Center ("MDC"), the defendant is permitted to possess the 3500 material outside the presence of counsel, except for a subset of the material identified by the Government as particularly sensitive in nature. The defendant, however, may not disseminate or show any of the 3500 material to any individual, other than defense counsel, any paralegal, or other staff employed by the defense for the purpose of representing the defendant. If the defendant's quarantine is lifted and counsel is again allowed to visit the defendant in the MDC, the protections of the prior 3500 protective order shall again control, Dkt. 151.

4. The defense can seek *ex parte* authorization of the Court to show (but not provide copies of) other specified 3500 material to persons whose access to such materials is otherwise prohibited by this Order. The Court shall grant the request if the Court determines that such access is necessary for the purpose of preparing the defense of the case. Each of the individuals to

whom disclosure of 3500 material is made shall be provided a copy of this Order by defense counsel of record and advised by defense counsel of record that he or she shall not further disseminate the 3500 material except at the express direction of counsel of record, and such direction will only be given if previously approved by the Court.

Dated: New York, New York

January 3, 2022

*Paul G. Gardephe*

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THE HONORABLE PAUL G. GARDEPHE  
United States District Court  
Southern District of New York